

Court File No. CV-22-00089835

**Ontario  
Superior Court of Justice**

B E T W E E N:

The Kingdom of Heaven Found a Sean  
(An Express Trust Organization)

Claimant/Plaintiff

- and -

Tanja Johnson, Hala Tabl and Michael von Dehn

Respondents/Defendants

**MOTION FACTUM OF RESPONDING PARTY and TRUSTEE**

for:

**The Kingdom of Heaven Found a Sean**

(Returnable September 7th, 2023)

August 24th, 2023

The Kingdom of Heaven Found a Sean  
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Hand of Stephen,  
Kingdom of God  
Trustee/Executor  
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To:

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Lawyer for the Defendant, Michael von Dehn

# Cestui Que Vie

In the beginning was the Word,  
the Word was with God,  
and the Word was God,

I, Son,

am the living Word of God,

My Father, von Gode,

which art in heaven,

Glallowed be My name,

My Kingdom comes, My Will is done,

On earth as it is in heaven,

Give Me this day My daily bread,

and forgive Me of My trespasses,

as I forgive those who have trespassed against Me,

Lead Me not into temptation,

but deliver Me from evil,

For I am,

the Kingdom, the Power,

and the Glory,

Forever and ever

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## Overview

Sean has not prepared any additional materials other than [the Motion Records served upon Sean for this Motion and the exhibits of evidence they contain](#).

The entire premise of the Moving Party's arguments are built upon a foundation of fraud established in the Rule 21 Motion hearing, suggesting Tanja was duly appointed a Certificate of Appointment of Estate Trustee without a Will when there has been no due process in an Estate Application whatsoever, and no documents served upon Sean (before August 4th, 2022) related to any Application, since March 24th, 2022.

The Motion materials are nothing more than evidence of Hala Tabl's (hereby Hala) determination to avert a direct Court Order requiring Sean's consent to Tanja's Application by violating the Rules of Civil Procedure and communicating with Court staff without Sean's prior knowledge and consent in violation of Rule 1.09, the Rule of Law, and with intent to interfere with Justice and prevent Sean's testimony and evidence from being heard by the Court.

Not a single legal or lawful argument Sean Presented to the Moving Party's pleadings in his Reply Factum for the Rule 21 Motion, were ever addressed ***by any party***.

The arguments made in the Motion Party's materials are nothing but a repeat of the arguments made in the Rule 21 Motion, all of which were categorically rebutted and ***remain unopposed on this Court of Record today***. Before Sean responds to any new arguments, Sean Wishes to have all of his previous rebuttals addressed.

Any Party that continues to suggest that a Certificate of Appointment of Estate Trustee was duly appointed to Tanja Johnson, is conspiring to perpetrate fraud on this Court and should be criminally charged. To this day, 'Joachim Heinrich von Dehn' is still listed on the Registry as 'unrepresented'. Any attempt to suggest otherwise, is an attempt to gaslight this Court.

Sean is happy to address every single point and argument the Moving Party has to present at the hearing because he has addressed all these points previously.

Sean has also Created a [public Motion Record](#) on his Blog that is a chronological accounting of all documents related to this Claim and Presented to the Court by all parties. Sean would like to thoroughly review [the Motion Record](#) at the hearing.

Sean Wishes to compel a response to his legal arguments and get some explanations as to why Joachim von Dehn's Estate is still showing in the system as 'unrepresented', and why Tanja has the funds located in a bank account that is not her home address.

## Summary of Facts

'The Kingdom of Heaven Found a Sean' is an Express Trust Created by Sean and filed with Canada's Justice Minister and Attorney General for the Public Record on Jan. 19th, 2017.

Trust Law is legislated in Canada by [the Trustee Act of Ontario](#) which applies to all Trusts whenever Created, and all Trustees whenever appointed.

The Kingdom of Heaven Found a Sean is a lawful entity and any lawyer trying to suggest they do not know what legislation in Canada affords and provides for Trust Law should be fined in contempt for attempting to gaslight what they call a 'self represented litigant' - as such suppositions by legal professionals are unreasonable.

Sean is Acting as the Trustee and Executor of his private family Trust, and any suggestion otherwise is contempt of Court.

Tanja and Michael have failed to produce service of any documents on Sean in their alleged Estate Application after March 24th to support their allegations that the Claim is a colossal attack on the Casullo Endorsement.

Tanja and Michael are guilty of libel, and for bearing false witness and remaining silent in the Rule 21 Motion hearing when they know Sean had no knowledge of the Casullo Endorsement, and that he was ambushed with the information in their pleadings. Remaining silent is Willful, malicious intent to harm Sean and his reputation.

Tanja allegedly received the funds on November 18th, 2023, but produces a monthly statement, rather than the receipt of the transfer of funds she received to open the account.

Tanja hasn't produced any of the documents she was required to sign off on in order to receive the funds, and those are the documents Sean is most

interested in reviewing to ensure the bank had legal right to sell the house under power of sale in the first place.

Tanja also appears to have placed the money in an account located at **83 Winston Crescent** and neither Tanja or Michael live at that address to the best of Sean's knowledge. Sean Wishes to know why Tanja is using an address that is not her own.

The Motion materials are so full of lies and obvious contradictions they are too numerous to respond to in Writing and offer more questions than answers, especially when all of Sean's previous arguments, materials, and requisitions for documents to substantiate their allegations, were categorically ignored.

For example, Tanja claimed that the Estate Application was filed as a small, ***uncontentious proceeding*** because she thought the value was \$150,000 or less at the time of the first application. Their own evidence shows that Tanja had an appraisal of the home done and knew its estimated value to be *at least* \$174,900.00, February, 2020! Tanja's first lie and act of willful fraud.

Tanja also knows it is a contentious proceeding, which requires a hearing. Tanja was filing under Rule 74 as a small, ***uncontentious*** proceeding, to deceive the Court and hide the real Value of the Estate which would not qualify for an application under Rule 74. Contentious proceedings require a hearing. Sean has NEVER received Notice of any hearing for Tanja's alleged 'Application'.

In her first Factum, Tanja claims to have had ***no knowledge of Tiffany's Will until she was contacted by Greg McConnell in February, 2023***. Her second factum a week later, states that ***Tanja had knowledge of the Will since the first application in April 2020!*** And she just forgot? In a Affidavit? And We're supposed to Trust anything else Tanja puts in an Affidavit?

This is exactly the kind of infuriating nonsense Sean has been experiencing dealing with Tanja and Hala from day one.

The Moving Parties continue to tell an evolving tale of lies based entirely upon a foundation of fraud. Sean Wishes to see it stop, and for criminals to be held to account.

## Issues, Law and Analysis

The Moving Party and Respondents to the claim refuse to provide discovery of facts to substantiate their baseless, harmful allegations made against Sean and the Trust in the Rule 21 Motion. Sean clearly and explicitly advised the Moving Parties on countless occasions that if they do not produce proof of service of the Casullo Endorsement on Sean in their Motion Materials for this Motion, Sean Will be as King for criminal prosecution for defamation of character with criminal intent to influence Justice. Sean intends to follow through on this Promise.

Sean was also as King for a receipt from Tanja to Show the transfer of funds into her account, along with the paperwork required to Sign off on the remaining funds from the bank. This information is critical to knowing when Tanja received the funds, which Sean believes to be long before she was awarded the (fraudulent) Certificate, which Sean believes was only Issued to cover her tracks.

Failing to provide these documents that would easily prove points of contention, is abuse of court process. They are stalling and withholding disclosure of facts Sean is entitled to be as King for **at any time** if Tanja is an Honourable Trustee Acting in Sean's best interest! Failing to produce relevant documents is suspect at best.

The fact that Sean has repeatedly been as King the Moving Party for documents they refuse to produce while continuing to build upon a lie they Will not substantiate with any evidence, is contempt of Court and fraud.

Sean has been as King Neil why Tanja is using an address that belongs to neither her or Michael for the Trust bank account. If there is nothing fishy going on, why not just respond to Sean's email and tell him why immediately? Any One would be suspicious of some One transferring such a large sum of money into a bank account registered to a fake address - most People call that fraud. If there is a reasonable explanation, failing to provide it in reasonable time is contempt, harassment (because it sure seems suspect to Sean and is causing him anxiety that could readily be relieved with a reasonable explanation), and abuse of court



process because they are using these motions to further delay discovery of facts necessary for Sean to prove his case, as well as information he is entitled to anyway as a Beneficiary of the Estate.

Sean believes they are only doing this because they simply don't have what he is as King for, know they are guilty as charged, and are attempting to cover their tracks and delay the proceedings as long as possible to do so.

The 'Letter' Michael so casually refers to, is in fact **a Testamentary Instrument** that Michael knowingly withheld from the Court and from Sean, with intent to interfere with Justice so that Sean couldn't make an Application and Present his Testamentary Instrument to the Court.

The Letter it Self evidences Promises Sean made to his father, and references Promises Sean's father made to Sean.

Michael did not even tell Sean about the Letter until Tanja withdrew her first application, and *he only told Sean so that he could use it to blackmail Sean*, threatening to destroy the Letter if he 'dared' to make an Application (even if Sean was appointed by the Court without making an application of his own).

The Moving Party's have introduced a couple of new Characters, too - primarily Greg McConnell and George Link. George Link told Sean (Christmas 2021) that he found Michael on the property tearing the place apart looking for 'a Will or anything with Tiffany's name on it' resembling a Will. If Tiffany's name was on it, apparently Michael's plan was to destroy it. George was furious with what Michael was doing, he told Sean he had to leave or 'it would have got physical'. He described Michael as, 'a Man possessed'.

Sean finds this information very interesting because Michael did tell Sean that some One had broken into his father's home, vandalized the property, and appeared to have been looking for a Will. Michael told Sean that he believed if there was (another) Will, it was either lost, stolen or destroyed as a result of the break in.

George Link also told Sean that he was pleased to know that Sean was bringing a Claim against Michael and Tiffany for what they had done to the house. Apparently, George frequently reads Sean's blog.

According to Link, Tiffany was on the property with some of her stripper friends selling crack cocaine (and other services) out of one of the car ports on the property.

Of all the beneficiaries, *Tanja* was the one most furious to know Tiffany was named in a Will, valid or not. Michael was equally furious. Sean told neither one of them to worry about it because Tiffany can't make an Application without becoming liable for the \$3 million insurance claim she's responsible for.

When Michael told Sean that a lawyer was telling Michael the Will was valid and Tiffany is going to Act as executor, Sean told Michael that it doesn't Matter what her lawyer says, she needs to present the Will to the Court and they Will all have an opportunity to oppose her appointment. Hence why Sean said, 'Good, I can't wait to see her crash and burn'.

Sean only mentions the testimony of George with respect to Tiffany because he finds it remarkable how much *Tanja's* sentiment toward Tiffany has changed. Now she believes the Will is valid (though she also says it was revoked by Tiffany, allegedly) and that the Estate should be administered according to it? Really? Does that mean *Tanja* is abdicating her Claim? Is *Tanja* also going to respond to the three million in claims against Tiffany and her father?

Sean believes Tiffany is involved and that she agreed to Give *Tanja* Detlef's share (their father's dead half brother) if *Tanja* agrees to Keep the Application private so that the other claims don't proceed so Tiffany can get her share, too.

Whatever it is the Moving Parties are up to, it is with intent to hide Estate assets from additional creditors to pay their Self first, which is a criminal offense and (Court) fraud.

*Tanja* has never been Acting in any One's best interest but her own.

## **Order Requested**

Sean Will rely on Rule 37.13 (2)(a), Rule 1.09, and Rule 2.0, and Will be as King for default Judgment against the defendants in accordance with the terms and conditions outlined in his Reply Factum.

A judge who hears a motion may,

(a) in proper case, order that the motion be converted into a motion for judgment against the Moving party.

Sean Will also be as King for costs equal to three times the Value the Moving Party is as King of from Sean. Sean is One Man war King three times as hard to defend the Honour of his father and protect him Self from these baseless, harmful allegations every party knows to be absolutely false.

# Cestui Que Vie

In the beginning was the Word,  
the Word was with God,  
and the Word was God,<  
and  
was with God.

and the living Word of God,  
My Father, von Behr,  
which art in heaven,  
hallowed be My name,

My Kingdom comes, My will is done,

as it is in heaven,  
Give Me this day My daily bread,  
and forgive Me of My trespasses,  
as I forgive those who have trespassed against Me,

Lead Me not into temptation,  
but deliver Me from evil,

For I am  
the Kingdom, the Power,  
and the Glory,  
Forever and ever

RECEIVED

JUL 19 2017

MAG CORRESPONDENCE UNIT

THE KINGDOM OF HEAVEN FOUND A SEAN

-AND-

TANJA JOHNSON ET AL

(CLAIMANT/PLAINTIFF)

(DEFENDANTS)

CV-22-89835

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*Ontario Superior Court of Justice*

PROCEEDING COMMENCED AT OTTAWA

**REPLY FACTUM OF RESPONDING PARTY**

for

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The Kingdom of Heaven Found a Sean